

### **REMARKS**

The Final Office Action dated January 30, 2006 contained a final rejection of claims 1-20. The Applicant has amended claims 1, 10, 14, and 19. Claims 1-20 are in the case. Please consider the present amendment with the attached Request for Continued Examination (RCE) under 37 C.F.R. § 1.114. This amendment is in accordance with 37 C.F.R. § 1.114. Reexamination and reconsideration of the application, as amended, are requested.

Claim 19 was rejected under 35 U.S.C. § 112, second paragraph, as being indefinite.

In response, the Applicant has amended claim 19 as suggested by the Examiner to overcome this rejection.

Claims 1-3 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith et al. (U.S. Patent No. 6,601,159) in view of Rapke-Kraft et al. (U.S. Patent No. 6,903,831). Claims 10-12 and 14-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith in view of U.S. Patent No. 6,718,490 to Takemoto et al. and Rapke-Kraft. Claims 19 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith in view of Takemoto, Rapke-Kraft, and U.S. Patent No. 5,784,561 to Bruno et al. Claims 6-9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and Rapke-Kraft as applied to claim 1, and further in view of Takemoto. Claims 4-5 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and Rapke-Kraft as applied to claim 1, and further in view of Bruno. Claims 13 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith, Takemoto, and Rapke-Kraft as applied to claims 10 and 14, and further in view of Bruno.

The Applicant respectfully traverses these rejections based on the amendments to the claims and the arguments below.

The Applicants respectfully traverse this rejection in light of the amendments to the claims and submit that the combined reference do not disclose all of the claimed features. Specifically, the combined references do **not** disclose the Applicant's claimed response module configured to automatically and asynchronously receive up-to-date audio/video printer information in response to user initiated technical support queries on a display in direct proximity with the printer. In contrast, Smith et al. merely discloses an "...integrated

information support system..." for a copy machine that give users "...access to vast quantities of graphical, textual, video and audio information..." using a "...large capacity memory device, such as a CD ROM..." (see Abstract of Smith et al.), while Takemoto et al. simply disclose a printer that can be connected to a network and Bruno merely disclose video conferencing. Although Rapke-Kraft disclose updating the operating system of the printer, the updating occurs "...after conversion work performed on the printing machine..." and "...in the event of changes in the structural state of the printing machine..." (see at least FIG. 4, Abstract, Summary, col. 2, lines 58-67 of Rapke-Kraft).

In contrast, the Applicant's claimed response module automatically and asynchronously receives up-to-date audio/video printer information in response to user initiated technical support queries, which is different from the combined references that updates the printer operating system after conversion work is performed on the printing machine when a technician makes physical changes in the structural state of the printing machine. For example, Rapke-Kraft explicitly states that "...it is a further object of the invention to provide a method of updating the operating system which, in the event of conversion work on the printing machine, permits a rapid and simple updating of the operating system..." (see Summary of Rapke-Kraft). Thus, the combination of Rapke-Kraft with the other cited references does not disclose, teach, or suggest the Applicant's claimed response module that automatically and asynchronously receives up-to-date audio/video printer information in response to user initiated technical support queries.

In addition, with regard to claim 19, although Bruno et al. disclose an on-demand real-time video conferecing system (see Abstract of Bruno et al.), unquestionably, the combined references do not disclose, teach, or suggest the Applicant's response module that automatically and asynchronously receives up-to-date audio/video printer information in response to user initiated technical support queries and allowing a user to initiate a video conference with a troubleshooting technical support center for the printer if a predetermined error condition occurs with the printer.

This **failure** of the cited references, in combination or alone, to disclose, suggest or provide motivation for the Applicant's claimed invention indicates a lack of a prima facie case of obviousness (*MPEP* 2143).

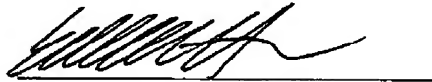
With regard to the rejection of the dependent claims, because they depend from the

above-argued respective independent claims, and they contain additional limitations that are patentably distinguishable over the cited references, these claims are also considered to be patentable (MPEP § 2143.03).

Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicants kindly request the Examiner to telephone the Applicants' attorney at **(818) 885-1575** if the Examiner has any questions or concerns. Please note that all correspondence should continue to be directed to:

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